

North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor Dee Freeman, Secretary

March 10, 2011

Sent Via US Mail and Email - jmitchell@alexandercountync.gov

Mr. Josh Mitchell Alexander County Solid Waste 621 Liledoun Road Box 12 Taylorsville, NC 28681

Re: Corrective Action Plan Addendum

Alexander County Landfill C&D Over MSW, Solid Waste Permit #02-01

Dear Mr. Mitchell:

The Solid Waste Section has reviewed the *Corrective Action Plan Addendum* (Doc ID 13033) dated December 20, 2010 submitted on behalf of Alexander County by Municipal Engineering Services Company, P.A.

Pursuant to 15A NCAC 13B .1636, Alexander County selected a remedy to restore groundwater quality at and beyond the relevant point of compliance, to effectively reduce the groundwater contamination at the facility, and to control the migration of contaminated groundwater to prevent unacceptable impacts to the adjacent surface waters. The Solid Waste Section approved the County's selected remedy on February 2, 2009, and the County's *Corrective Action Plan* on February 19, 2009.

Within the document titled *CAP Modification Request* dated August 10, 2010, the County provided two requests to the Solid Waste Section regarding a modification to the County's approved *Corrective Action Plan*. The requests included the implementation of a new timeline/schedule that differs from the timeline/schedule within the County's approved *Corrective Action Plan*, and a modification to the bioremediation injection medium. The County would like to use an edible oil substrate (EOS) instead of a hydrogen release compound (HRC). The Solid Waste Section issued a letter on August 24, 2010 approving the requests, and then the *Corrective Action Plan Addendum* was submitted to the Solid Waste Section.

The Corrective Action Plan Addendum includes the implementation of the following remedy:

- Monitored Natural Attenuation (MNA),
- Phytoremediation,
- Enhanced bioremediation using an edible oil substrate (EOS),
- Active Methane Extraction System, and
- Acquisition of Property.



As a result, the Solid Waste Section hereby approves the *Corrective Action Plan Addendum* for immediate implementation. The implementation of the approved selected remedy within the *Corrective Action Plan* dated February 6, 2009 and the *Corrective Action Plan Addendum* shall take place in accordance with 15A NCAC 13B .1637 and pursuant to the timelines (Table 9) located within both documents. If the selected remedy proves to be ineffective, then the contingency plan located within the County's *Corrective Action Plan* dated February 6, 2009 shall be implemented. In addition, please continue to conduct Appendix II water quality monitoring pursuant to 15A NCAC 13B .1634(b), 15A NCAC 13B .1634(d)(2), and 15A NCAC 13B .1637(a)(1).

If you have any questions or concerns regarding this letter, please contact me at 919-508-8500 or by email at jaclynne.drummond@ncdenr.gov. Thank you for your continued cooperation with groundwater corrective action at this facility.

Sincerely,

Jaclynne Drummond

Compliance Hydrogeologist

Solid Waste Section

Division of Waste Management

cc via email: Rick French, Alexander County Manager (rfrench@alexandercountync.gov)

Mark Poindexter, Field Operations Supervisor

Deb Aja, Western District Supervisor

C.T. Gerstell, Environmental Senior Specialist

Larry Frost, Permitting Engineer